

are attached hereto and constitutes all known process, pleading and orders served in the action as EXHIBITS A, B and C.

II. ARGUMENT AND AUTHORITY

2. This case was initially filed in state court on August 7, 2014. Defendant, **ERWIN ALVARADO VALLE**, was served on or about August 22, 2014.

3. This removal is filed within 30 day of service, and is removable under 28 U.S.C. §1446(b).

4. Pursuant to Plaintiffs' Petition, Defendant, **SEACON LOGIX, INC.** is a California corporation.

5. Defendant, **ERWIN ALVARADO VALLE** is, and at all times mentioned was, a resident of El Monte, California.

6. Plaintiffs, **ESTEBAN TREVIZO-LOPEZ, INDIVIDUALLY AND AS PERSONAL REPRESENTATIVE OF THE ESTATE OF TERESA LOPEZ-CERRILLO, DECEASED, ALEXANDRA TREVIZO-LOPEZ, INDIVIDUALLY AND AS NEXT FRIEND OF [REDACTED], MINOR CHILD, ADAN TREVIZO-LOPEZ, ARELI TREVIZO-LOPEZ**, are residents of Mexico, and may be served with notice through their attorney of record, Richard Hardy, 1115 Broadway, Lubbock, Texas 79401.

7. The district courts of the United States have original jurisdiction over this action based on diversity of citizenship among the parties, in that Defendant, **ERWIN ALVARADO VALLE**, is now and was at the time the action was

commenced, diverse in citizenship from Plaintiff. Defendant is, and was not, at the time suit was commenced a citizen of the State of Texas.

8. Jurisdiction of this court is based on TITLE 28 of the UNITED STATES CODE, 28 U.S.C.A. §1332 and §2201. There is diversity of citizenship between Defendant and Plaintiffs, and the amount in controversy exceeds \$75,000.00.

9. Removal of this action is proper under 28 U.S.C.A. §1441, since it is a civil action brought in a state court, and the federal district courts have original jurisdiction over the subject matter under 28 U.S.C.A. §1332 because the Plaintiff and Defendant are diverse in citizenship.

WHEREFORE, **ERWIN ALVARADO VALLE**, Defendant, pursuant to these statutes and in conformance with the requirements set forth in 28 U.S.C.A. §1446, removes this action for trial from the 143rd Judicial District Court of Reeves County, Texas to this Court.

Respectfully submitted,

RAMSEY & MURRAY, P.C.

By: Wayne Walters *Walters*

Wayne Walters

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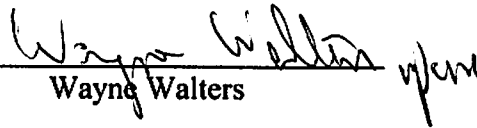
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**ATTORNEY FOR DEFENDANT,
ERWIN ALVARADO VALLE**

CERTIFICATE OF SERVICE

I, hereby certify that on this 22nd day of September, 2104 a true and correct copy of this document has been properly served on all counsel of record and that the original was promptly filed with the UNITED STATES DISTRICT CLERK'S OFFICE FOR THE WESTERN DISTRICT OF TEXAS, PECOS DIVISION.


Wayne Walters